

EXHIBIT 1 TO ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHRISTMAS TREE SHOPS, LLC, *et al.*,¹

Debtors.

Chapter 7

Case No. 23-10576 (TMH)

(Jointly Administered)

GEORGE L. MILLER, in his capacity as Chapter
7 Trustee of CHRISTMAS TREE SHOPS, LLC
et al.,

Plaintiff,

vs.

LANE REFRIGERATION COMPANY, INC.
d/b/a LANE ASSOCIATES,

Defendant.

Adv. Proc. No. 25-50838 (TMH)

**STIPULATION FOR FURTHER EXTENSION
OF TIME FOR THE DEFENDANT TO ANSWER THE COMPLAINT**

Plaintiff, George L. Miller in his capacity as chapter 7 trustee of Christmas Tree Shops LLC, *et al.*, (the “**Plaintiff**”), for the estates of the above-captioned debtors (the “**Debtors**”) in the above-captioned cases pending under chapter 7 of title 11 of the United States Code (the “**Bankruptcy Code**”), by and through his undersigned counsel and defendant Lane Refrigeration Company, Inc. d/b/a Lane Associates (the “**Defendant**,” and together with Plaintiff, the “**Parties**”), enter into this *Stipulation for Further Extension of Time for Defendant to Answer the*

¹ The Debtors in these chapter 7 cases and the last four digits of each Debtor’s U.S. tax identification number are as follows: Christmas Tree Shops, LLC (1207), Handil, LLC (1150), Handil Holdings, LLC (2891), Salkovitz Family Trust 2, LLC (8773), and Nantucket Distributing Co., LLC (1640).

Complaint (the “Stipulation”) and hereby stipulate and agree as follows:

1. The Parties agree and stipulate that the time within which the Defendant may answer the *First Amended Complaint* [D.I. 3] in the above-captioned adversary proceeding is hereby further extended to and including August 21, 2025.

2. Except as specifically set forth herein, the Parties reserve all of their respective rights in this matter.

Dated: July 25, 2025

Dated: July 25, 2025

PACHULSKI STANG ZIEHL & JONES LLP

CONNOLLY GALLAGHER

/s/ Peter J. Keane

Bradford J. Sandler (DE Bar No. 4142)
Peter J. Keane (DE Bar No. 5503)
Edward A. Corma (DE Bar No. 6718)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: bsandler@pszjlaw.com
pkeane@pszjlaw.com
ecorma@pszjlaw.com

/s/ Karen C. Bifferato

Karen C. Bifferato
1201 North Market Street, 20th Floor
Wilmington, DE 19801
Telephone: (302) 888-6221
Email: kbifferato@connollygallagher.com
Counsel to Defendant
Lane Refrigeration Company, Inc. d/b/a Lane Associates

*Counsel to Plaintiff George L. Miller, Chapter 7
Trustee of Christmas Tree Shops, LLC, et al.*